

Exhibit 1 (Part 12 of 14)

Attachments E-H to

Affidavit of David K. Draper

Attachment E

08/29/2002

A Source, who is in a position to testify, was interviewed at an undisclosed location. In addition to the investigating agents, also present during the interview were [REDACTED]

During the interview, Source was shown a series of documents, photographs and three separate video tapes. There were no conversations between the investigators and Source regarding the aforementioned items shown to Source prior to Source first seeing each of the items.

TAREEKH, Al MUSADAT, 86, 87, 88, Folder 8, Documents 301-347

Source was afforded an opportunity to review handwritten Arabic documents stored as a computer file titled as above stored on a disk taken as evidence from the Bosnian office of BENEVOLENCE INTERNATIONAL FOUNDATION (BIF) on March 19, 2002. While reviewing the documents, Source provided the following information:

Source identified Document Number 332 in this set of documents as listing his own biographical information. Source indicated that Source provided this information to an individual whose name Source cannot currently recall. Source met this individual upon arriving at the Al Masada Camp in the Jaji region of Afghanistan. Source noted that Al Masada is the name of a specific camp in the Jaji region. Source indicated that Source has often used the names Al Masada and Jaji interchangeably during past interviews. Source added that during any past interviews when Source made reference to the Jaji camp, Source was actually talking about Al Masada. Source provided background information stating that Jaji was the original name of the region given by the Afghani people. Source described Jaji as a Furani name. Source explained that USAMA BIN LADEN named his camp in this region Al Masada. Source believed that Al Masada translates to the Lion's House.

Source indicated that the handwriting on Document Number 332 within this group of documents is not Source's handwriting. Source reiterated that upon Source's arrival at the Al Masada camp during approximately 1987 or 1988, he was asked a series of questions which corresponded to the answers appearing on this document. According to Source, Source answered these questions verbally and someone else wrote the information on this piece of paper.

While reviewing the names corresponding to other biographies contained in the documents of this computer file, Source indicated that Source recognized the following names:

Document Number 314 - ABDALLAH Al ROOMI. Source

indicated that ABDALLAH AL ROOMI is a member of Al QAEDA. Source recalled that ABDALLAH AL ROOMI was instructed by ABU HAFS AL MASRI, who Source also indicated was a member of Al QAEDA, to kill JAMIL Ur RAHMAN. Source explained that JAMIL Ur RAHMAN was an Afghani leader who had close ties to representatives of the Saudi Arabian government. Source advised that JAMIL Ur RAHMAN was attempting to influence wealthy Saudi Arabians not to provide money to BIN LADEN and his Al QAEDA network. As a result, JAMIL Ur RAHMAN and BIN LADEN were at odds with each other. Source estimated that ABDALLAH AL ROOMI killed JAMIL Ur RAHMAN during 1989 or 1990. Source was certain that JAMIL Ur RAHMAN was killed after ABDALLAH AZZAM had been murdered. Source stated that ABDALLAH AL ROOMI killed JAMIL Ur RAHMAN after Friday prayers at a mosque located in a village near Peshawar. According to Source, ABDALLAH AL ROOMI posed as a journalist and began interviewing JAMIL Ur RAHMAN regarding his relationship with the Saudi government. As JAMIL Ur RAHMAN answered questions, Al ROOMI pulled out a small handgun and shot him. Al ROOMI was immediately killed by JAMIL Ur RAHMAN's bodyguard.

Source recognized the name of the individual listed on Document Number 312 - ABU AL ABBAS AL MADANI. Source advised that ABU AL ABBAS AL MADANI was an Al QAEDA member. Source advised that he and Al MADANI swore bayat to Al QAEDA at the same ceremony.

Source initially met ABU AL ABBAS AL MADANI at the Khaled Ibn Waled Camp. Source added that he and ABU AL ABBAS AL MADANI also trained together at the Al Masada Camp. After leaving Al Masada, he and ABU AL ABBAS AL MADANI assisted other members of Al QAEDA in building the Al Farouq Camp which was located in the vicinity of Khost. Source explained that the Al Farouq Camp was a specialized camp that was to be used to test potential Al QAEDA recruits. Training at this camp lasted 45 days and consisted of the following: a basic weapons course, a course in Islamic law, a mental stress course, and a course which taught discipline. According to Source, if a recruit ranked high in his class at Al Farouq, he was given an opportunity to swear bayat and become an Al QAEDA member. If a recruit did not receive a high ranking, they were equipped and sent to the front in Afghanistan to take part in the jihad against the Russians.

Source explained that ABU HASSAN AL SUDANI and SABIR THE EGYPTIAN were responsible for running the Al Farouq Camp. Source explained that ABU HASSAN AL SUDANI was primarily responsible for logistics and supplies and SABIR THE EGYPTIAN oversaw and provided direction to the camp's trainers. Source described SABIR THE EGYPTIAN as the Emir of the camp. Source added that both ABU HASSAN AL SUDANI and SABIR THE EGYPTIAN were Al QAEDA members.

Source advised that after the construction of the Al Farouq Camp had been completed during 1989 or early 1990, Source and ABU AL ABBAS AL MADANI went to fight on the front in the vicinity of Jalalabad. During a battle ABU AL ABBAS AL MADANI was shot in the head and killed while he and Source were trying to move the body of another dead Al QAEDA member, a Libyan whose name

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Source could not currently recall. Source explained that Al QAEDA had a strict rule not to leave the body of a dead Al QAEDA member behind. As such, Source and ABU Al ABBAS Al MADANI were in the process of moving the corpse of another Al QAEDA member when ABU Al ABBAS Al MADANI was killed.

Source recognized the individual whose name was listed on Document Number 338 by his nickname - BATHAN Al SUDANI. Source recalled that BATHAN Al SUDANI was very proficient with the RPG and also received extensive training in mortars. Source first met BATHAN Al SUDANI at the Khaled Ibn Waled Camp where BATHAN Al SUDANI was a trainer. Source added that BATHAN Al SUDANI also received his initial training in weapons and mortars at the Khaled Ibn Waled Camp. Source added that Source received training from BATHAN Al SUDANI while at the Khaled Ibn Waled Camp.

According to Source, Source later met up with BATHAN Al SUDANI at the Al Areen Camp which was located in the area of Jaji near the Al Masada Camp. Source indicated that BATHAN Al SUDANI was later made one of the Emirs of the Al Masada Camp. According to Source, BATHAN Al SUDANI was in charge of one of the sections of Al Masada. Source was unable to currently recall which section of the Al Masada Camp BATHAN Al SUDANI oversaw.

Source added that at some point later, BIN LADEN and ABDALLAH AZZAM sent BATHAN Al SUDANI and ABDUL HALIM MOHAMED DOSMAN to Khartoum, Sudan for the purpose of establishing an office to recruit Arab mujahideen fighters. Source was aware that while BATHAN Al SUDANI was in the Sudan, he trained members of the Eritrean Islamic Jihad group who were based just east of the Sudan during this time. According to Source, BIN LADEN had recruited the Eritrean Islamic Jihad group to follow the Al QAEDA agenda. Additionally, the Eritrean Islamic Jihad group focused on overthrowing the Eritrean government that was run by Christians at this time. Source advised that the goal of the Eritrean Islamic Jihad group was to overthrow or "Islamize" the Eritrean government.

Source approximated that during late 1992, while in the Sudan, BATHAN Al SUDANI also worked for TABA INVESTMENTS, a BIN LADEN run company which was based in Khartoum.

Source recognized the name of the individual listed on the biography numbered 341 - WADI El HAGE. (Further information detailed in prior FBI New York FD-302s.)

After reading each page corresponding to the TAREEKH, Al MUSADAT, folders 86-88, documents 301-347 file, Source indicated that Source believed these documents were Al QAEDA files which corresponded to Al QAEDA members and/or recruits. Source indicated that Source was extremely surprised that the investigators were in possession of these files.

ABDALLAH AZZAM

Source explained that ABDALLAH AZZAM taught Islamic law

at ISLAMABAD COLLEGE. After BIN LADEN had arrived in Pakistan during approximately 1985, BIN LADEN and AZZAM met in Peshawar. Also present during the initial meeting between BIN LADEN and AZZAM was ABDEL RASOUL SAYYAF, who Source described as a prominent leader in Afghanistan at that time. Source explained that the purpose of this meeting was twofold: first, the individuals present wanted to establish a way to recruit and fund Arab mujahideen to participate in the Afghanistan jihad. Additionally, the individuals wanted to establish a media outlet that would be used to chronicle the Afghanistan jihad.

According to Source, as a result of this meeting, BIN LADEN, AZZAM and ABDEL RASOUL SAYYAF established AL JIHAD magazine which was published on a weekly basis. Source indicated that AZZAM was initially responsible for the day-to-day operation of AL JIHAD magazine.

Source advised that also resulting from this meeting was the establishment of MEKHTAB AL KHIDEMAT, also known as the Services Office. Source explained that MEKHTAB AL KHIDEMAT was used to raise money, support the Afghan jihad, and move Arab fighters that were recruited from other Arab countries in and out of Afghanistan. According to Source, MEKHTAB AL KHIDEMAT basically provided logistical support to the Arab mujahideen participating in the Afghan jihad.

Source advised that MEKHTAB AL KHIDEMAT was also responsible for establishing guest houses, which were used to house incoming Arab mujahideen. The guest houses were located in the following areas: Beit Al Ansar which was located on Abdara Road in Peshawar; Beit Al Salam which was also located in Peshawar; Beit Al Quraba which was located in Hyatabad, approximately 15 minutes outside Peshawar; Beit Al Shehada, also known as the House of Martyrs, which was also located in Hyatabad; Miram Shah which was located on the Afghanistan/Pakistan border on a travel route towards the Afghanistan town of Khost; a guest house whose name Source cannot currently recall, which was located in Torkham on a route from Pakistan to Afghanistan that the mujahideen would travel to get to the Afghanistan city of Khandahar; and another guest house, whose name Source cannot recall, which was established solely to house women, primarily wives of the Arab mujahideen who had traveled into Afghanistan to take part in the jihad.

During the early stages, both BIN LADEN and AZZAM oversaw the day-to-day operation of MEKHTAB AL KHIDEMAT. According to Source, AZZAM primarily focused on specific issues related to MEKHTAB AL KHIDEMAT while BIN LADEN acted as more of the overall leader or Emir of the operation. Source explained that BIN LADEN gave orders to AZZAM and also provided his own money to fund MEKHTAB AL KHIDEMAT. Additionally, according to Source, BIN LADEN would leave Peshawar on occasion for the purpose of participating directly in the Afghan jihad.

At some point later, BIN LADEN and AZZAM went their separate ways based on disagreements of their ideologies.

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According to Source, AZZAM wanted to focus primarily on changing the Afghan government to Islam. Source explained that AZZAM wanted to finish the jihad in Afghanistan before moving into other countries. AZZAM believed that the Arab mujahideen should not get involved in trying to create Islamic states in other countries until they had completed what they had started in Afghanistan.

According to Source, BIN LADEN on the other hand was being influenced by the Egyptians who were working with him. As a result, BIN LADEN believed that the Arab mujahideen had the ability to attack and overthrow the governments of numerous countries at the same time. It was BIN LADEN's goal to convert the governments of every Gulf area country to Islam. BIN LADEN wanted to first focus on the Arab countries to include Egypt as well as others in the Gulf area. As a result, during approximately late 1989, BIN LADEN issued a fatwah to the Egyptian Islamic Jihad group granting them permission to take up a jihad against the government of Egypt. Additionally, BIN LADEN provided the Egyptian Islamic Jihad group with money and logistical support for this purpose. According to Source, several months later BIN LADEN issued a separate fatwah allowing Arab mujahideen to initiate a jihad against the government of Algeria.

As a result of their differing ideologies, BIN LADEN and AZZAM formally split. AZZAM opened his own camp which he named Khaldan that was located on the border of Afghanistan and Pakistan in the vicinity of Parachinar. The individuals who continued to follow AZZAM were based at this camp. Source noted that most of the individuals who followed BIN LADEN and AZZAM stayed on with BIN LADEN. It was also at this time that AZZAM took over sole control of the MEKHTAB Al KHIDEMAT office, as well as the building which housed the office and the Sabalil mosque which was located in Peshawar. Source noted that Sabalil translates to "Strong Lion at Night." Source advised that AZZAM continued to use the mosque to give lectures regarding his theory to focus solely on the jihad in Afghanistan. After the jihad in Afghanistan was finished, AZZAM preached that they should then initiate a jihad in Asia, followed by Tajikistan, followed by Uzbekistan, and then Chechnya. Source noted that BIN LADEN took sole control of the guest houses located in the Peshawar area at this time.

Source advised that AZZAM was eventually murdered. (Further information is detailed in prior FBI New York FD-302s.) Prior to AZZAM's death, MEKHTAB Al KHIDEMAT was utilized for the sole purpose of providing funding and logistical support to the Arab mujahideen. After AZZAM's death, MEKHTAB Al KHIDEMAT continued to fund the Arab mujahideen. However, according to Source, MEKHTAB Al KHIDEMAT did not generate as much money after AZZAM was killed. Source believed that some of the individuals who worked at MEKHTAB Al KHIDEMAT after AZZAM's death were skimming or stealing money that was to be directed to support the Arab mujahideen.

GULBUDIN HEKMATYAR

Source advised that GULBUDIN HEKMAYTAR was one of six primary tribal leaders in Afghanistan during the 1980's. According to Source, HEKMAYTAR's followers were known as the HEZ B ISLAMI GROUP. Source explained that when BIN LADEN and AZZAM initially formed MEKHTAB AL KHIDEMAT and began to fund the Arab mujahideen, they believed that HEKMAYTAR was the most qualified Afghan military leader. As a result, BIN LADEN and AZZAM provided the majority of the money which they raised to HEKMAYTAR. Source explained that they provided this money to HEKMAYTAR primarily because HEKMAYTAR was a strong believer of the Muslim religion and shared many of the same ideals as BIN LADEN. According to Source, HEKMAYTAR's rise to power was a direct result of his relationship with BIN LADEN.

Source advised that HEKMAYTAR was a leader of the Pushtun tribe. According to Source, HEKMAYTAR had completed college and studied the Koran prior to the war in Afghanistan.

Source advised that JALALUDIN HAQANI was a commander under HEKMAYTAR who operated in the areas of Khost and Manikando. Source advised that HAQANI was also a staunch supporter of BIN LADEN.

Source explained that when BIN LADEN and AZZAM went their separate ways, HEKMAYTAR and his supporters stayed with BIN LADEN. HEKMAYTAR also believed BIN LADEN's philosophy that the Arab mujahideen could initiate wars and be successful in many countries at the same time. Source advised that many of the non-Afghan Arabs and BIN LADEN's followers worked for and fought under HEKMAYTAR. Additionally, HEKMAYTAR's HEZ B ISLAMI GROUP also consisted of some of HEKMAYTAR's own Pushtun tribal fighters.

Source advised that because of his strong relationship with BIN LADEN, HEKMAYTAR often spoke about jihad at the guest houses and camps that were run by BIN LADEN. Source last saw HEKMAYTAR during approximately 1990.

TAREEKH OSAMA, Folder 56, Document 136

Source was afforded an opportunity to review a handwritten Arabic document stored as a computer file titled as above on a disk taken as evidence from the Bosnian office of BIF on March 19, 2002. While reviewing the document, which was a chart, Source provided the following information:

Based on the fact that ABDALLAH AZZAM's name was listed on this chart, Source believed that the chart had to be created prior to the previously described split between BIN LADEN and AZZAM. As a result, according to Source, this chart would have been created prior to the official formation of Al QAEDA. However, Source indicated that almost everyone listed on the chart was an Al QAEDA member, and those listed who never swore bayat to Al QAEDA strongly supported the Al QAEDA agenda. Source explained that it did not matter whether the group had taken the Al QAEDA name at this point in time. According to Source, based on their common ideologies and beliefs, Source considered many of those listed on

this chart, with the distinct exception of AZZAM, as Al QAEDA. Source compared the chart with an analogy to a soccer team that had played together for several years and had never used a formal name. Source stated that if one day the soccer team took on a formal name, they were no different than the day before when they played together without a formal name.

While Source reviewed the chart, SA [REDACTED] handwritten numbers next to the names of individuals on the chart who Source identified and provided information. The numbers handwritten on the chart will correspond to the numbers listed in this section of the FD-302:

1. ABU Al HASSAN listed under the title "Jihad support." Source advised that ABU Al HASSAN was from Madina, Saudi Arabia and Source referred to him as ABU Al HASSAN Al MADANI. Source advised that ABU Al HASSAN's true name was WAEL JULAIDAN. Source explained that he was of Saudi Arabian descent. Source was aware that ABU Al HASSAN Al MADANI ran the Pakistan office of the INTERNATIONAL ISLAMIC RELIEF ORGANIZATION which Source also referred to as IGASA. Source explained that the INTERNATIONAL ISLAMIC RELIEF ORGANIZATION fell under the RABITA Al ISLAMI organization which Source also knew to use the name MWLKA.

2. ASADALLAH listed under the title "The Chamber." Source knew an ASADALLAH known as ASADALLAH Al SINDI. Source described ASADALLAH as a treasurer who received funds from ABU Al HASSAN Al MADANI and distributed the funds when they were needed.

3. ABU Al HASSAN listed under the title "The Front Lines." Source knew this individual to also go by the name of ALI HAROUN. According to Source, his responsibility was to ensure that the mujahideen fighters on the front had the necessary supplies.

4. ABU Al RIDA listed under the title "Missions." (Information on ABU RIDA is detailed in prior FBI New York FD-302s.)

5. ABU MUATH listed under the title "Expenditures." Source knew ABU MUATH as ABU MUATH Al URDUNI (the "Jordanian"). Source advised that ABU MUATH was a member of Al QAEDA. According to Source, ABU MUATH was also an engineer by trade who assisted in building the Al Masada and Al Areen Camps both of which were located in the Jaji area. Source recalled that ABU MUATH was responsible for building many of the tunnels and caves that were used in these camps. In addition, ABU MUATH, at BIN LADEN's direction, also built the Tahadi Road which Source referred to as the "Challenge Road," that linked Khartoum to Port Sudan. According to Source, BIN LADEN wanted this road built to show the Sudanese government what type of assistance Al QAEDA would be able to provide to their country. Source noted that ABU MUATH also was responsible for building a road in the Sudan that connected the cities of Damazine and Koromuk.

6. SHEIKH ABDALLAH listed under the title "Jihadist"

Indoctrination." According to Source, SHRIKH ABDALLAH is another name used by ABDALLAH AZZAM who is described in detail in a previous section of this FD-302.

7. ABU ABDALLAH listed under the title "Equipping the Arabs." Source indicated that ABU ABDALLAH's full name was listed on the chart as ABU ABDALLAH AL BELKI. Source noted that the word AL BELKI was hard to read. Source advised that ABU ABDALLAH AL BELKI was a member of AL QAEDA. Source believed that ABU ABDALLAH AL BELKI was either of Jordanian or Lebanese descent. ABU ABDALLAH AL BELKI worked at MEKHTAB AL KHIEMAT. According to Source, ABU ABDALLAH AL BELKI was responsible for providing incoming Arab mujahideen fighters with money and a letter. The mujahideen fighters would later exchange this letter for a Kalishnikov rifle, two hand grenades, a canteen, web gear, and ammunition upon their arrival at a training camp.

8. ABU IBRAHIM listed under the title "Propagation and Immigration." Source advised that ABU IBRAHIM also went by the name ABU IBRAHIM AL IRAQI. According to Source, ABU IBRAHIM was an AL QAEDA member. Additionally, ABU IBRAHIM ran the Peshawar office of the KUWAITI RED CRESCENT SOCIETY, which Source described as a charity that was used to raise money for the Arab mujahideen. Source advised that ABU IBRAHIM often lectured about jihad. Source was also aware that ABU IBRAHIM was a relative of ABU HAJER. ABU IBRAHIM eventually became the manager of HIJRA CONSTRUCTION COMPANY, a BIN LADEN business that built roads and bridges in the Sudan. According to Source, the roads and bridges built by the HIJRA CONSTRUCTION COMPANY were funded 60% by BIN LADEN and 40% by the Sudanese government. (Further information about ABU IBRAHIM AL IRAQI is detailed in FBI New York FD-302s.)

9. ABU UBAIDAH listed under the title "Military Affairs." Source indicated that ABU UBAIDAH was a former AL QAEDA military commander who also went by the name UBA UBAIDAH AL BANSHIRI. (Further information about ABU UBAIDAH AL BANSHIRI is detailed in prior FBI New York FD-302s.)

10. ABU HAJER listed under the title "Guest Houses." Source advised that ABU HAJER also went by the name ABU HAJER AL IRAQI. (Further information about ABU HAJER is detailed in prior FBI New York FD-302s.)

11. ABU UBAIDAH listed under the title "The Fronts." Source was not certain, but believed that the ABU UBAIDAH listed in this section of the chart may be the same ABU UBAIDAH listed under the title "Military Affairs" and referred to in number 9 above.

12. ABU BURHAM listed under the title "Training." Source advised that ABU BURHAM is an AL QAEDA member. Source knew ABU BURHAM as ABU BURHAN AL IRAQI. Source estimated that ABU BURHAN should currently be in his 50's. Source indicated that he received training from ABU BURHAN in general weapons at the Al Masada Camp. Source noted that ABU BURHAN is very proficient with explosives and described ABU BURHAN as an excellent trainer.

13. SHEIKH TAMEEM (no title listed). Source advised that SHEIKH TAMEEM was an Al QAEDA member. Source also knew SHEIKH TAMEEM as SHEIKH TAMEEM ADNANI. Source described SHEIKH TAMEEM as approximately 5'9" with a heavy build. Source added that SHEIKH TAMEEM was very overweight. Additionally, Source recalled that SHEIKH TAMEEM wore glasses and was of Palestinian or Jordanian descent. Source heard that SHEIKH TAMEEM had been killed by the United States Government at a hospital located in the United States. Source advised that SHEIKH TAMEEM was responsible for overseeing the finances of Al Masada for a period of time. According to Source, SHEIKH TAMEEM traveled frequently and collected a lot of money that was used to support Al Masada.

14. ABU TARIQ (listed directly beneath SHEIKH TAMEEM and does not have a title). Source advised that ABU TARIQ is an Al QAEDA member of Palestinian descent. Source explained that ABU TARIQ worked for ABDALLAH AZZAM at the MEKHTAB Al KHIDEMAT office in Peshawar. ABU TARIQ was responsible for transporting money from the MEKHTAB Al KHIDEMAT office to the various training camps. ABU TARIQ also was involved in the issuance of identification cards from charities and schools that falsely represented that the mujahideen fighter depicted on the card worked for a particular charity or school. (Further information about ABU TARIQ is detailed in prior FBI New York FD-302s.)

15. ABU Al RIDA listed under the title "Purchases." Source believed that the ABU Al RIDA listed in this section was the same ABU Al RIDA listed under the section titled "Missions," detailed above under number 4. Source noted that ABU Al RIDA also went by the name ABU Al RIDA Al SURI. (Further information is detailed in prior FBI New York FD-302s.)

16. ABDEL QUDDOUS listed under the title "ID Cards, Registration Documents, Visas." Source believed that ABDEL QUDDOUS is a member of Al QAEDA. Source never witnessed ABDEL QUDDOUS swear bayat to Al QAEDA. However, based on Source's experience with Al QAEDA as well as the places which ABDEL QUDDOUS worked and the individuals with whom ABDEL QUDDOUS associated, Source believed that ABDEL QUDDOUS was an Al QAEDA member. Source stated that ABDEL QUDDOUS is possibly a United States citizen and should now be approximately 55 years old. Source described ABDEL QUDDOUS as a close friend of BIN LADEN. Source noted that after BIN LADEN and AZZAM went separate ways, ABDEL QUDDOUS kept his allegiance with BIN LADEN.

Source explained that every time an Arab mujahideen traveled in and out of Afghanistan, they were required to meet with ABDEL QUDDOUS to get the proper visa paperwork. According to Source, ABDEL QUDDOUS was responsible for obtaining a Pakistani permanent residency visa for all of the Arab mujahideen as well as anyone associated with BIN LADEN. Source was aware that ABDEL QUDDOUS paid large sums of money to Pakistani government officials in order to obtain the Pakistani permanent residency visas. Because of the bribes which ABDEL QUDDOUS paid, ABDEL QUDDOUS

never required to provide Pakistani government officials with the true nature of the Arab mujahideen reason for being in Pakistan. According to Source, ABDEL QUDDOUS initially worked at the MEKHTAB AL KHIEMAT office in Peshawar. ABDEL QUDDOUS later worked at a Korkulala area guest house which was located on a travel route between Peshawar and Hyatabad. Source recalled that the Korkulala guest house was in a building owned by JALALUDIN HAQANI, who was previously described in this FD-302 as a military commander who worked under HEKMAYTAR.

Source last saw ABDEL QUDDOUS in Pakistan during approximately 1992. While in the region, Source often saw ABDEL QUDDOUS at BIN LADEN run training camps. Source also fought alongside of ABDEL QUDDOUS on the front near the city of Jalalabad. Prior to traveling to the front, Source saw ABDEL QUDDOUS at the Al Areen Camp where he stayed for a few weeks prior to moving to the front to take part in the jihad.

17. ABU OMAR listed under the title "Budget." Source advised that ABU OMAR is a member of Al QAEDA. Source also knows ABU OMAR as ABU OMAR AL MAKI. Source explained that ABU OMAR was responsible for purchasing food and supplies in Peshawar and transporting these items to the front where they were provided to the mujahideen fighters.

18. ADEL FARHAT (not listed under a title). Source described ADEL FARHAT as a dark-skinned individual of Saudi Arabian descent. Source noted that ADEL FARHAT and BIN LADEN were very close. Source believed that ADEL FARHAT may have run the AL BIRR AL DAWALIA charity organization for a period of time. Source recalled that AL BIRR AL DAWALIA had an office in the Sudan during the early 1990's. Source noted that AL BIRR AL DAWALIA also had an office in Zagreb, Croatia at one point in time. Source advised that BIN LADEN specifically used these two AL BIRR AL DAWALIA offices as a means to move money to Al QAEDA. (Further information is detailed in prior FBI Chicago FD-302.)

19. ABDALLAH ANAS (not listed under a title). Source advised that ABDALLAH ANAS is a member of Al QAEDA. Source believed that ABDALLAH ANAS is of Algerian descent. Source stated that ABDALLAH ANAS married ABDALLAH AZZAM's daughter. (Information detailed in FBI New York FD-302s.)

20. ISAMIDEEN (not listed under a title). Source advised that ISAMIDEEN was a member of Al QAEDA. Source believed ISAMIDEEN is of Libyan descent. Source described ISA MIDDEEN as a very good trainer. According to Source, he and ISAMIDEEN worked together at Al Masada. Source also fought alongside ISAMIDEEN at the front in Jalalabad.

MURASLATALM'SADA, Folder 5, Document 6

Source was afforded an opportunity to review a handwritten Arabic document stored as a computer file titled as above on a disk taken as evidence from the [redacted] [redacted]

March 19, 2002. While reviewing the document, Source provided the following information:

Source described this document as a radio frequency chart. According to Source, the chart was probably set up as a way to communicate by a secret code system. Source recognized the following names listed on the chart: AZMARI, who Source identified as an Al QAEDA member (Further information is detailed in prior FBI New York FD-302s.); ABU ANEES, who Source identified as an Al QAEDA member of Saudi Arabian descent; ABU MUATH, who Source previously described during the interview and is detailed in a prior section of this FD-302; and ABU MUKHLAFI. Source indicated that ABU MUKHLAFI, whose name appeared in Block Number 8/1, was one of BIN LADEN's drivers and also acted as BIN LADEN's primary bodyguard. Source described ABU MUKHLAFI as being dark skinned, muscular, and in good shape. Source indicated that ABU MUKHLAFI was from Yemen. Source recalled that while in Pakistan, Source observed ABU MUKHLAFI, on numerous occasions, driving BIN LADEN around in a LAND CRUISER station wagon.

MURASLATALM' SADA, Folder 52, Document 56

Source was afforded an opportunity to review a handwritten Arabic document stored as a computer file titled as above on a disk taken as evidence from the Bosnian office of BIF on March 19, 2002. While reviewing the document, Source provided the following information:

Source advised that this document listed radio channels corresponding to, or used to identify with different individuals. Source noted that BIN LADEN was identified as Channel 11 and ABU UBAIDAH was listed as Channel 21.

Based on the document, Source indicated that ABU MAHMOUD was responsible for running the communications center. Source noted that ABU MAHMOUD was assigned to Channel 1. Source advised that ABU DIJANA, who Source believed was of Yemeni descent, was assigned to Channel 2. Source recalled that ABU DIJANA was responsible for communicating with the front lines. Source indicated that Channel 3 was assigned to the mortar tent. Source advised that this channel was used by the individuals who operated the mortar fire on the front lines. Source indicated that Channel 4 was assigned to the Bader room. Source noted that Bader was a famous battle in Afghanistan. Source advised that Channel 5 was assigned to ABU Al DAHAB's room. Source recalled that ABU Al DAHAB was a famous Egyptian that was killed during a battle in the Afghanistan war. After ABU Al DAHAB was killed, the area where he had died was named after him. As such, Source believed that this radio channel was utilized by people who operated in the area where ABU Al DAHAB had been killed. Source indicated that Channel 6 corresponded to the Zikoyak. Source noted that the Zikoyak was an anti-aircraft gun that had four separate barrels. Source explained that this radio channel was probably used by individuals who were at the station where this gun was operated. Source advised that Channel 7 was assigned to Al Taif. Source noted that Al Taif is a

city in Saudi Arabia which was also used as a name to identify a specific location on the front lines during the Afghanistan war. Source noted that Channel 8 was assigned to Qabaa which is the name of a mountain in Afghanistan.

TAREEKH OSAMA, Folder 50, Documents 122-123

Source was afforded an opportunity to review a handwritten Arabic document stored as a computer file titled as above on a disk taken as evidence from the Bosnian office of BIF on March 19, 2002. While reviewing the document, Source provided the following information:

Source noted that the document was dated August 11, 1988. According to Source, this was approximately the time that Al QAEDA was formed.

According to Source, this document detailed a discussion between ABU RIDA and BIN LADEN. According to Source, the document detailed ABU RIDA and BIN LADEN setting up three separate training camps: a general camp, a special camp (which Source explained as being more advanced) and an Al QAEDA camp (which Source described as being used by very elite fighters).

Source noted that at one point in the document ABU RIDA indicated that if the group which they are discussing is formed, the military personnel who currently follow and support BIN LADEN must join this group. It appeared to Source as though someone was writing down or taking notes about what ABU RIDA and BIN LADEN were saying. Based on the contents of what was written, Source believed that the words attributed to "THE SHEIKH" would have been BIN LADEN's words.

Source also noted that a section of the document made reference to Al Masada. Source advised that during the month of Ramadan, approximately late 1987, a famous battle occurred in the Jaji region where Al Masada was located. During this battle, the Afghan mujahideen were able to hold off the Russian troops and win the battle. As a result of this battle, Al Masada became a famous place. Source added that he was not present at this battle.

Source noted that the handwriting in this document was consistent throughout and it appeared as though the document was written by one person.

TAREEKH OSAMA, Folder 55, Documents 128-135

Source was afforded an opportunity to review handwritten Arabic documents stored as a computer file titled as above on a disk taken as evidence from the Bosnian office of BIF on March 19, 2002. While reviewing the documents, Source provided the following information:

Source indicated that the document listed a group of people who attended a meeting. According to Source, the name of

each attendee was listed next to a number. Source provided the following information related to each of the attendees:

2. ABU HAJER (Further information is detailed in prior FBI New York FD-302s).

3. ABU USAMA AL JAZAIRI. Source advised that ABU USAMA AL JAZAIRI was a member of Al QAEDA. Source described ABU USAMA AL JAZAIRI as a tall, light skinned Algerian. Source indicated that ABU USAMA AL JAZAIRI was a good trainer who worked closely with ABU HAFS AL MASRI.

4. AMEER AL FATEH. Source advised that AMEER AL FATEH was an Egyptian and either the brother or cousin of ABU UBAIDA AL BANSHIRI. Source added that AMEER AL FATEH was a member of Al QAEDA. Source indicated that AMEER AL FATEH was responsible for training people on Russian tanks, specifically Type 55 tanks. Source last saw AMEER AL FATEH in 1995 in Khartoum. (Additional information detailed in FBI New York FD-302s.)

5. YASEEN AL IRAQI. Source advised that YASEEN AL IRAQI was a member of Al QAEDA. Source added that YASEEN AL IRAQI is the brother of ABU AYOUB. Source recalled that YASEEN AL IRAQI purchased weapons from a representative of the Pushtun tribe on behalf of Al QAEDA.

7. ASSADULLAH. Source advised that he may know this individual as ASSADULLAH AL SINDI. Source was not certain if the individual listed was the same individual who he knew as ASSADULLAH AL SINDI.

8. ABU KHALID AL MASRI. Source advised that ABU KHALID AL MASRI is a member of Al QAEDA. Source stated that ABU KHALID AL MASRI was formerly a member of the Egyptian military and was a very good trainer. Source recalled that ABU KHALID AL MASRI had a problem with his eyes. (Further information is detailed in prior FBI New York FD-302s.)

9. ABU HABEEB. Source knew ABU HABEEB as ABU HABEEB AL TAAFI. Source explained that ABU HABEEB AL TAAFI was from the town of Tiaf which is located in Saudi Arabia. According to Source, ABU HABEEB AL TAAFI was a member of Al QAEDA. Source recalled that ABU HABEEB AL TAAFI worked for ABDEL QUDOUS. Source last saw ABU HABEEB AL TAAFI in Khartoum during approximately 1995.

10. ABU ABDUL RAHMAN. Source knew ABU ABDUL RAHMAN as ABU ABDUL RAHMAN AL SIRAIHI. Source advised that ABU ABDUL RAHMAN was a member of Al QAEDA. Source described ABU ABDUL RAHMAN as dark skinned. Source noted that ABU ABDUL RAHMAN had memorized the Koran and had a very good knowledge of Islamic law.

12. IBN AL QAYYIM. Source knew IBN AL QAYYIM as IBN AL QAYYIM AL SAUDI. Source explained that IBN AL QAYYIM is from Saudi Arabia. According to Source, IBN AL QAYYIM is a member of Al

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QAEDA. Source advised that he attended training along with IBN AL QAYYIM at the Jihad Wal Camp and at a camp located in Khost. After looking at the document for a while longer, Source noted that the IBN AL QAYYIM listed may not be the same IBN AL QAYYIM who he had just described.

Source did not know the individuals listed next to numbers 13 or 14. Source advised that ABU THAR AL MISRI, who was also referred to in this document, is the brother of AYMAN ZAWAHARI.

TAREEKH OSAMA, Folder 54, Documents 127-127a

Source was afforded an opportunity to review handwritten Arabic documents stored as a computer file titled as above on a disk taken as evidence from the Bosnian office of BIF on March 19, 2002. While reviewing the documents, Source provided the following information:

Source advised that Source knows everyone listed on page one of this document with the exception of ABU AL HASSAN AL MAKI. Source added that ABU AL HASSAN AL MAKI is listed next to the number 8.

Source referred to the section of the document that was titled "Reads the Pledge." Source explained that the section listed under this heading was the first Al QAEDA bayat. Source noted that it was the same bayat which Source swore to when Source entered Al QAEDA and signed Source's contract. When Source became a sworn Al QAEDA member, Source also signed a written contact with Al QAEDA at the same time he swore to this pledge.

According to Source, this document reflects the official formation of Al QAEDA on the date set forth in the document, September 10, 1988. According to Source, that was the date BIN LADEN's followers officially took the name Al QAEDA.

HEKMATYAR VIDEOTAPE #1

Source was afforded an opportunity to review segments of a video tape (Video Tape #1) previously provided to FBI Chicago by a Source. While reviewing the tape, Source stated that the only individual he recognized on this tape was GULEUDIN HEKMATYAR. Additionally, Source did not recognize any of the areas where this tape had been filmed.

HEKMATYAR VIDEOTAPE #2

Source was afforded an opportunity to review a video tape (Video Tape #2) previously provided to FBI Chicago by A Source. During a segment of the tape where several men are constructing a satellite telephone, based on Source's understanding of their

Arabic conversation, Source believed that the telephone had been shipped from the United States or that the money used to purchase the telephone was from a source in the United States.

While reviewing another segment of the tape, Source noted that the individual wearing glasses was being referred to as BASHIR (phonetic). Source noted that the individual referred to as BASHIR referred to the other individual who was helping BASHIR and HEKMAYTAR put the satellite telephone together as ABU MAHMOUD.

While reviewing a separate segment of the tape, Source indicated that he previously saw the individual who was lying on his back on a bed and the individual referred to as BASHIR at Al Bunyan Al Mahrsous publication business and Islamic news center. (Further information on Al Bunyan Al Mahrsous is detailed in prior FBI New York FD-302s.)

Source recalled that when he arrived in Afghanistan during approximately 1989, BIN LADEN drove a white SUV which appeared to be identical to the white SUV that the two individuals, BASHIR and ABU MAHMOUD, had been driving at the beginning of this tape.

During another segment of the tape, Source noted that the individual in the white hat, previously referred to as ABU MAHMOUD, is either of Syrian or Jordanian descent.

While reviewing a section of the tape where HEKMAYTAR is shown having a conversation on the satellite telephone, Source advised that based on HEKMAYTAR's side of the conversation, Source believed that the individual to whom HEKMAYTAR is speaking was the same individual who purchased the satellite telephone, and had it delivered by ABU MAHMOUD and BASHIR.

During 1992, while living in the Sudan, Source was instructed by MADANI AL TAYYIB to go to Budapest and from Budapest to travel on to Zagreb, Croatia. In addition to MADANI AL TAYYIB, Source also received instruction on his travel directly from BIN LADEN and ABU HAJER. During his travel, Source was arrested and detained in Budapest. (Further information about this trip is detailed in previous FD-302s.) After his release from prison, Source continued his travel to Zagreb. Source advised that the purpose for traveling to Zagreb was to assess the situation with regard to Arab mujahideen providing assistance to the Bosnians in their war against the Serbs. While in Zagreb, Source met with a Syrian, whose name he cannot currently recall, who ran the AL BIRR AL DAWALIA charity office. Source did recall that the Syrian who ran the Zagreb office of AL BIRR AL DAWALIA was the same individual who handled money for BIN LADEN in Afghanistan. Source was not certain that he would recognize the Syrian individual if he saw him again. Source did recall seeing the Syrian individual at the QATAR charity office in Afghanistan.

Source explained that Source's reason for meeting with the Syrian individual at AL BIRR AL DAWALIA was due to the fact

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that AL BIRR AL DAWALIA provided funding and logistical support to AL QAEDA. Specifically, Source advised that AL BIRR AL DAWALIA provided food, identification cards and funding used to train and equip AL QAEDA fighters. Source was not certain if the Syrian individual who ran the Zagreb office of AL BIRR AL DAWALIA was a sworn member of AL QAEDA. However, Source was certain that this individual as well as the AL BIRR AL DAWALIA charity supported the AL QAEDA agenda.

While in Zagreb, Source had a second meeting with the Syrian who ran the AL BIRR AL DAWALIA office. This meeting took place at a large mosque located in Croatia. Also present for this meeting was ABU ABDEL RAHMAN, also known as THE HOWN. During this meeting, Source, ABU ABDEL RAHMAN and the Syrian discussed the jihad in Bosnia. Specifically, they discussed the fact that the Bosnians do not fight with the same ferocity as the Afghan or Furani mujahideen.

After returning to the Sudan from Zagreb, Source briefed both BIN LADEN and AL TAYYIB about the status of the Bosnian war. BIN LADEN indicated that Bosnia would never become an Islamic state. However, BIN LADEN felt it was important for AL QAEDA to assist the Bosnians in an effort to establish an AL QAEDA base of operations or presence in Europe from which they would have easy access to other European countries as well as the western nations. According to Source, AL BIRR AL DAWALIA was used as a primary funding source for the establishment of AL QAEDA training camps and to support the AL QAEDA and Arab mujahideen who fought in Bosnia.

Source was aware that ADEL BATTERJEE, who Source described as a wealthy Saudi Arabian, ran AL BIRR AL DAWALIA. Source advised that MOHAMED KHAIR was a Sudanese individual who managed AL BIRR AL DAWALIA's office in Khartoum. KHAIR traveled to Saudi Arabia during approximately 1993. According to Source, while KHAIR was in Saudi Arabia, he was detained by Saudi law enforcement officers for approximately 45 days. Source advised that KHAIR was held in a Saudi Arabian hotel and repeatedly questioned regarding the relationship between AL BIRR AL DAWALIA and BIN LADEN. Source had a conversation with AL TAYYIB regarding KHAIR's detention in Saudi Arabia. According to Source, AL TAYYIB felt that KHAIR was detained and questioned because the Saudi Arabian government found documents and records that linked AL BIRR AL DAWALIA directly to BIN LADEN. AL TAYYIB told Source that the problems with AL BIRR AL DAWALIA had been handled, but AL TAYYIB did not elaborate on what the problems were. Source advised that this conversation took place at BIN LADEN's big guest house located in Section 9, Riyadh City, Khartoum, Sudan.

Source discussed a separate conversation which Source estimated occurred during approximately 1995 at BIN LADEN's big guest house in Section 9, Riyadh City, Khartoum, Sudan. During this conversation, Source and BIN LADEN were discussing the fact that \$20,000 used by AL QAEDA to fund the plot to kill Egyptian President HOSNI MUBARAK came from the QATAR CHARITABLE SOCIETY. BIN LADEN informed Source that this \$20,000 was to be used to fund

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the travel of Al QAEDA members who would execute the assassination and to purchase weapons that would be used to execute the plot. During the conversation, BIN LADEN became very angry because he felt that the way this money was withdrawn from the QATAR CHARITABLE SOCIETY could have been traced. BIN LADEN was adamant that he did not want anyone to find out that Al QAEDA operations were funded by the QATAR CHARITABLE SOCIETY. During this conversation, BIN LADEN mentioned that AL BIRR AL DAWALIA as well as other charities were also utilized by Al QAEDA for similar purposes. Source noted that during 1995, BIN LADEN and Al QAEDA were continuing to utilize QATAR CHARITABLE SOCIETY, AL BIRR AL DAWALIA and other charities to fund operations. BIN LADEN did not want people to find out that Al QAEDA was using these charities as a source of funding. BIN LADEN specifically did not want to lose the ability to use these charities for funding.

Source noted that he had a similar conversation with BIN LADEN regarding the same topic, the use of charities to fund Al QAEDA, during approximately 1993. This conversation also took place at BIN LADEN's big guest house located in Section 9, Riyadh City, Khartoum, Sudan. (Further information detailed in prior FD-302's)

ALJABALDAYLEYRE, Folder 34, Document 45

Source was afforded an opportunity to review a handwritten Arabic document stored as a computer file titled as above on a disk taken as evidence from the Bosnian office of BIF on March 19, 2002. While reviewing the document, Source provided the following information:

According to Source, ALJABAL translates in English to "mountain." Source believed that the document was attempting to establish a system or schedule on how to run things at a camp.

Source believed that the ABU MAHMOUD referred to in this document may have been a Syrian who Source met at MEKHTAB AL KHIEMAT. Source knew this individual as ABU MAHMOUD AL SURI. Source described ABU MAHMOUD as ABDULLAH AZZAM's assistant. Source also met ABU MAHMOUD at the Khaled Ibn Waled camp. According to Source, ABU MAHMOUD was at the Khaled Ibn Waled Camp visiting with the camp's Emir, ABU SHAHEED AL FALASTINI. Source believed the last time he saw ABU MAHMOUD was in Jalalabad. ABU MAHMOUD was with ABU HASSAN, the Palestinian. According to Source, ABU HASSAN was a reporter for AL BUNYAN MAHRIOUS and AL JIHAD magazine.

Source recalled that while ABU HASSAN and ABU MAHMOUD were driving together near the Kobar Mountains in Jalalabad, ABU HASSAN was killed by a sniper. Source recalled that after ABU HASSAN's death, SALEH LIBI, who Source described as an Al QAEDA member based in Jalalabad, arrived at the scene of ABU HASSAN's death, took a video camera owned by ABU HASSAN and filmed ABU

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HASSAN's dead body. Source believed that AL BUNYAN MAHRSOUS would have run a story regarding ABU HASSAN's death due to the fact he was a famous reporter.

Source was not certain if ABU MAHMOUD ever swore bayat to become an Al QAEDA member. However, according to Source, ABU MAHMOUD was a supporter of the Al QAEDA agenda. Source recalled that ABU MAHMOUD was one of the first Arabs to come to Afghanistan. Source also recalled that ABU MAHMOUD worked very closely with HEKMAYTAR. Source advised that ABU MAHMOUD also worked at several guest houses with ABU HAJER and ABU TARIQ, the Palestinian. Source recalled that ABU MAHMOUD eventually worked directly for BIN LADEN. According to Source, prior to ABU MAHMOUD working for BIN LADEN, ABU MAHMOUD worked with both HEKMAYTAR and ABU SAYYAF. Source advised that he knew a lot of additional information regarding ABU MAHMOUD. Source was unable to recall any of this information at this point.

TAREEKH OSAMA, Folder 4, Documents 19-27

Source was afforded an opportunity to review a photocopy of an article written in AL JIHAD magazine. The article which was written in Arabic, was stored as a computer file titled as above on a disk taken as evidence from the Bosnian office of BIF on March 19, 2002. While reviewing the document, Source provided the following information:

Source noted that the article made reference to ABU MAHMOUD AL SURI. Source believed that the ABU MAHMOUD AL SURI referred to in this article is the same ABU MAHMOUD AL SURI whom Source previously described that was referenced in the document titled ALJABALDAYLEYRE, Folder 34, Document 45. While reviewing the document, Source indicated that the photographs which were part of the article were of poor quality. As a result, Source was unable to identify anyone in these photographs.

TAREEKH OSAMA, Folder 1, Documents 1-4

Source was afforded an opportunity to review a May 4, 1988 newspaper article that had been stored as a computer file titled as above on a disk taken as evidence from the Bosnian office of BIF on March 19, 2002. While reviewing the document, Source provided the following information:

While looking at the photograph on the second page of this article (Document 2), Source identified the individual to the left of BIN LADEN (BIN LADEN's left as Source looked at the photograph) as ABU MAHMOUD AL SURI. Source added that this individual was the same ABU MAHMOUD AL SURI who he had described earlier in the previous two documents, the AL JIHAD magazine article and the document stored under the file name ALJABALDAYLEYRE, Folder 34, Document 45. While looking at the photograph of BIN LADEN flanked by ABU MAHMOUD AL SURI, Source stated that he knows much more about ABU MAHMOUD AL SURI but Source was struggling to recall specifics at this time. Source did recall

that the first occasion he met ABU MAHMOUD AL SURI was at the Khaled Ibn Waled Camp while Source was receiving training. Source added that he also saw ABU MAHMOUD AL SURI accompanying BIN LADEN when BIN LADEN delivered a lecture in the AL AREEN area at a mosque located under the mountain. Source recalled that ABU HAJER gave a prayer and following the prayer BIN LADEN spoke to the newly trained Arab mujahideen recruits. Source noted that the recruits whom BIN LADEN was addressing were making their final preparations before going to the front to take part in the fighting.

BOSNIAN PHOTOGRAPH BOOK

Source was afforded an opportunity to review a book of photographs that were stored as computer files on a disk taken as evidence from the Bosnian office of BIF on March 19, 2002. While reviewing the book, Source identified individuals in the following photographs:

Photograph 154, HEKMAYTAR

Photograph 158, Column 2, middle photo, the individual on the right dressed in white was a reporter from Jalalabad.

Photograph 179, Source identified BIN LADEN in the photograph and indicated that the photograph appeared to have been taken at Al Masada.

Photograph 182, Source believed that the photograph was taken at Al Masada. Source noted that Source and ABDALLAH, a Saudi Arabian, flipped an all terrain vehicle similar to the one pictured while at Al Masada.

Photograph 379, Source identified ABU RIDA AL SURI dressed in the multi-colored shirt with his head located directly below the letter "K."

Photograph 382, Source identified ABU RIDA AL SURI, again dressed in a multi-colored shirt.

Photograph 384, Source identified the individual on the left as ABDEL SALAAM SAAD SULIMAN. Source indicated that this individual was the manager of the DAWA organization in the Sudan. According to Source he is also a member of the National Islamic Front. ABDEL SALAAM SAAD SULIMAN also worked for the Sudanese intelligence agency. Source believed that he had power and control over police headquarters. Source advised that ABDEL SALAAM SAAD SULIMAN was the boss of SHARAF ELDINE ALI MUKHTAR and also worked for the Militia "Defar Al Shabi".

Photograph 396, Source identified the individual in the light blue shirt as one of the individuals who he met with at the AL BIRR AL DAWALIA office in Zagreb.

Photograph 411, Source advised that ABU QUTAIBA was wearing the blue shirt in the top/left photo. Source advised that

the individual in the lower right corner of the bottom/left photo looked like ESAMELDINE AL LIBBY.

Photograph 412, bottom photograph, Source advised that the individual dressed in blue looked like ABU QUTAIBA AL SURI.

Photograph 444, Source identified BIN LADEN wearing a white robe with his back facing the camera and ABU RIDA on the far right.

Photograph 448, This photograph depicted a document, which was written in Arabic. According to Source, it appeared to list a series of questions from a mujahideen to someone who is Syrian. According to Source, sometimes when a spy is identified within Al QAEDA, the spy would be questioned in a similar fashion.

Source advised that ABU SHAHEED AL FALASTINI, ABU TARIQ AL FALASTINI and ABU ABDULLAH AL BELKI were friends of ABU MAHMOUD AL SURI.

Source recalled a conversation which Source had with ABU ZUBAIR AL MADANI, who Source described as a member of Al QAEDA, and ABU ABDEL RAHMAN at the AL BIRR AL DAWALIA office in Zagreb, Croatia. During the conversation, ABU ZUBAIR AL MADANI and ABU ABDEL RAHMAN informed Source that they had purchased weapons in Cologne and transported the weapons via Zagreb into Bosnia. Based on this conversation, it appeared to Source that the funds used to purchase the weapons in Cologne by ABU ZUBAIR AL MADANI and ABU ABDEL RAHMAN came from AL BIRR AL DAWALIA and FATIH ABU HASSANEIN of THIRD WORLD.

During their conversation which took place at AL BIRR AL DAWALIA, ABU ABDEL RAHMAN pointed to an individual who Source believed to be a AL BIRR AL DAWALIA employee and advised Source that this individual was the person responsible for giving ABU ABDEL RAHMAN and ABU ZUBAIR AL MADANI the money for the weapons. Source recalled seeing this same individual, the AL BIRR AL DAWALIA employee, in the Sudan visiting DR. MOHAMAD ABDALLAH MOHAMAD YOUSEF of the QATAR CHARITABLE SOCIETY. Source also saw this same individual with BIN LADEN at BIN LADEN's big guest house in the Riyadh City, Section 9. Source added that he saw this same individual, the AL BIRR AL DAWALIA employee, in Afghanistan on a number of occasions at various guest houses and in the presence of BIN LADEN. Source referred to this individual as the "Star" which Source described as being very important to the jihad of Al QAEDA. Source recalled that this individual whom he previously referred to as the "Star" also worked with DR. MAHMOUD ZAYED, a Palestinian who was involved with the jihad group in Israel. DR. MAHMOUD ZAYED lived on Street 32 next to the Qatar Embassy in Khartoum near the airport. The AL BIRR AL DAWALIA employee who Source referred to as the "Star" also knew MOHAMED SHABANNA. According to Source, the "Star" was considered very important by Al QAEDA due to the fact that the "Star" had the ability to get money from wealthy people and funnel the money to Al QAEDA. Source considered the "Star" to be on the same level of importance as SAAD AL SHARIF, ABU AMJED,

and ABU BARAA. (Further information detailed in prior FBI New York FD-302s.) Source further described the AL BIRR AL DAWALIA employee, also referred to as the "Star", as being well-trusted within Al QAEDA.

Source recalled that ABU ZUBAIR AL MADANI and ABU ABDEL RAHMAN were sent to Bosnia by Al QAEDA to establish a training system which would include a camp structure. Additionally, ABU ZUBAIR AL MADANI and ABU ABDEL RAHMAN were to identify and/or develop businesses that would be purchased and/or utilized by Al QAEDA. Thirdly, ABU ZUBAIR AL MADANI and ABU ABDEL RAHMAN were to establish a relationship between Al QAEDA and the relief organizations that were based in Bosnia and Croatia. Source advised that ABU ABDEL RAHMAN gave instruction to the Emirs fighting inside Bosnia. Source had a conversation with ABU ABDEL RAHMAN while at the AL BIRR AL DAWALIA office in Zagreb. Also present during this conversation was the AL BIRR AL DAWALIA employee who Source previously referred to as the "Star." During the conversation, ABU ABDEL RAHMAN advised Source that Al QAEDA's main reason for fighting in Bosnia was to establish a base in Europe that would benefit Al QAEDA in fighting their true enemy who ABU ABDEL RAHMAN identified as the United States. Source noted that Source also visited Al HARAMAIN with ABU ABDEL RAHMAN while in Bosnia.

Source advised that while in the Sudan, Source was told the same story regarding ABU ZUBAIR AL MADANI and ABU ABDEL RAHMAN's travel in Bosnia. The story was told to Source by ABDEL AZIZ ISSAWI, also known as ABU HASSAN AL SUDANI.

While in the Sudan working for TABA INVESTMENTS, Source met with MADANI AL TAYYIB. During the meeting, MADANI AL TAYYIB instructed Source to go to Chechnya. MADANI AL TAYYIB advised Source that he would give Source \$1,500 cash, from Al QAEDA, which was to be used by Source to purchase a Kalashnikov which Source would then use to fight in Chechnya. According to MADANI AL TAYYIB, the fight in Chechnya "was good." MADANI AL TAYYIB informed Source that Al QAEDA needed people to go to Chechnya and assist in the fighting. MADANI AL TAYYIB described to Source the route Source would take to travel to Chechnya. According to MADANI AL TAYYIB, Source would first travel to Turkey and meet with ABU ISRA AL IRAQI and ABU AHMED. According to MADANI AL TAYYIB, ABU ISRA AL IRAQI and ABU AHMED would assist Source in traveling from Turkey to Dagestan, or a country near Dagestan. From there, Source would travel to Baku, Azerbaijan. Upon arriving in Baku, Azerbaijan, Source would stay at a guest house with other mujahideen fighters. Someone from Azerbaijan would then smuggle Source and the other mujahideen fighters into Chechnya for a fee. Source did not go to Chechnya because of a strong objection by his wife.

THE BALKAN WAR VIDEOTAPE

Source was afforded an opportunity to watch a videotape titled The Balkan War. While watching the tape Source provided the

following information:

Source identified the individual pictured in a circle on the tape as ABU ZUBAIR AL MADANI. Source described ABU ZUBAIR AL MADANI as an AL QAEDA member and a cousin of BIN LADEN. According to Source's translation of the Arabic dialogue on the videotape, the orator for the video indicated that ABU ZUBAIR AL MADANI had been killed fighting in Bosnia. Source verified that the details on the tape were correct and Source noted that Source was personally aware that ABU ZUBAIR AL MADANI had died from a bullet wound to his throat.

Source provided a summary translation of the Arabic writing appearing at the beginning of the videotape. According to Source, the writing indicated that everything on this tape belongs to the AL BIRR organization. You cannot tape or sell this tape without permission of AL BIRR. According to Source, anyone who attempted to copy or sell this tape would be punished or fined.

Source was asked to provide any information regarding individuals who Source knew by the following names:

ABU HAMZA - Source advised that Source knows three different individuals who used the name ABU HAMZA. Source stated that one of the individuals was Sudanese, one was Egyptian, and the other is Saudi Arabian.

ABU MOHAMED AL MAQDISI - Source advised that ABU MOHAMMED AL MAQDISI wrote two or three books. According to Source, one of the books is titled THE CLEAR EVIDENCE TO START JIHAD. Source advised that ABU MOHAMED AL MAQDISI is an associate of AZMIRI and MOHAMED SHOBANA. Source believed that ABU MOHAMED AL MAQDISI is a close associate of BIN LADEN's AL QAEDA group. Source also added that ABU MOHAMED AL MAQDISI is very good with Islamic law.

ABDEL SAMIA - Source does not know anyone who uses this name.

MOHSEN AL LUBNANI - Source does not know anyone who uses this name.

ABU AISHA - Source knows an individual who uses the name ABU AISHA. Source believed the individual was either of Jordanian or Palestinian descent. Source met ABU AISHA in Afghanistan. Source advised that ABU AISHA is a close friend of ABU RAWDHA. Source added that ABU AISHA was a member of AL QAEDA and worked at MEKHTAB AL KHIEMAT. Source does not know ABU AISHA's current whereabouts.

USAMA LUBNANI - Source attended a training class with USAMA LUBNANI while at Al Masada. The specific class which both Source and USAMA LUBNANI attended was a security guard training class. According to Source, the Emir of the class was ABU MUTAIB. Source noted that RIDA AL TUNISI, BIN LADEN's bodyguard, also took this class at the same time. (Further information regarding RIDA

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AL TUNISI is detailed in prior FBI New York FD-302s.)

ABU ABDALLAH AL BELKI - Source advised that ABU ABDALLAH AL BELKI worked at MEKHTAB AL KHIEMAT. ABU ABDALLAH AL BELKI provided mujahideen recruits with instructions and a letter that would later be traded for weapons and equipment necessary to fight. Source recalled that Source, ABU THAER AL SUDANI and ABU YOUSEF AL QARTARI all received individual letters from ABU ABDALLAH AL BELKI prior to entering Afghanistan to fight in the jihad. In addition, ABU ABDALLAH AL BELKI gave Source and the other two individuals a car which they used for travel.

While based in Jalalabad, Source and other mujahideen fighters referred to weapons and ammunition as fruits and vegetables. Source specifically recalled that a tomato was a code name used for a mortar shell. Source also recalled that they used specific countries as directional codes when speaking on the radio.

TAREEKH OSAMA, Folder 41, Document 108

Source was afforded an opportunity to review a handwritten Arabic document stored as a computer file titled as above on a disk taken as evidence from the Bosnian office of BIF on March 19, 2002. While reviewing the document, Source provided the following information:

Source identified the individual listed next to number 4, YOUSEF JAMEEL, as purchasing a satellite phone for BIN LADEN. (Further information is detailed in prior FBI New York FD-302s.)

Source stated that the individual listed next to number 6, SALEH KAMEL, owns AL BARAKA BANK. Source was informed by both MADANI AL TAYYIB and ABU RIDA that they had used SALEH KAMEL's bank.

While reviewing the document, Source indicated that some of the names appearing on the document appeared to be members of a group who Source referred to as the "Golden Chain." According to Source, the "Golden Chain" consisted of wealthy individuals from the Gulf region who provided BIN LADEN and Al QAEDA with money on a regular basis.

Source explained that all Muslims are required to make zakat, which according to Source means donating 2.5% of their total yearly earnings to one of six different tenants of Islam. According to Source, one of the tenants to which the money can be donated is jihad.

Source had a specific conversation with MADANI AL TAYYIB during which MADANI AL TAYYIB informed Source that both YOUSIF JAMEEL and SALEH KAMEL donated their zakat funds, via the "Golden Chain," to BIN LADEN's Al QAEDA group.

Source recalled a separate conversation which Source had with KHALIFA AL OMANI. During the conversation, KHALIFA AL OMANI

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informed Source that KHALIFA AL OMANI had a conversation with BIN LADEN regarding the governments of the Gulf states. During the conversation, BIN LADEN indicated to KHALIFA AL OMANI that BIN LADEN would never fight or attempt to change the governments of any Gulf state because members of the "Golden Chain" reside in those states.

Source noted that the name AL-RAJHI listed next to number 7 on this document is the name of a bank in which Al QAEDA had funds on deposit.

Source noted that the name BATERJEE appearing to the right of many of the names on the document is the same name of the individual who Source referred to earlier as one of the main people who operated AL BIRR AL DAWALIA.

Due to time constraints, the interview was terminated. Prior to terminating the interview, Source indicated that Source had additional information regarding some of the individuals who Source described during the course of this interview. Source specifically stated that Source had much more knowledge regarding ABU MAHMOUD AL SURI. Source would telephonically contact the investigating Agents to provide this information.

Attachment F

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 21 MC 97 (AKH)

4

5
IN RE: SEPTEMBER 11

6

7 LITIGATION

8

9

10 SWORN WITNESS STATEMENT
TAKEN BY VIDEOTAPE
11 CONFIDENTIAL

12

13

DATE: October 26, 2004
14 TIME: 11:15 AM

15 LOCATION: Law Offices of
Motley Rice, LLC
16 28 Bridgeside Boulevard
Mt. Pleasant, SC

17

TAKEN BY: Counsel for the Plaintiffs

18

REPORTED BY: TERRI L. BRUSSEAU,
19 Registered Professional
Reporter, CP, CRR

20

21 Computer-Aided Transcription By:

22 A. WILLIAM ROBERTS, JR., & ASSOCIATES

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2

1 APPEARANCES OF COUNSEL:

2 ATTORNEYS FOR THE PLAINTIFFS:

3 MOTLEY RICE, LLC
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Mount Pleasant, SC 29464
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6

ALSO PRESENT:

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Jack Petit, Video Technician

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1 THE WITNESS, being first duly

2 sworn, testified as follows:

3 EXAMINATION

4 BY MR. ELSNER:

5 Q. Good morning. Thank you for agreeing

6 to help out the victims of the September 11th

7 attacks this morning. Can you please explain for

8 me your educational background and your

9 professional background?

10 A. I have a Bachelor of Science degree

11 from the University of Tennessee. I have an

12 Associate's degree in the Spanish language from a

13 college in Arizona. I was a municipal police

14 officer, an immigration inspector, a border patrol

15 agent, an antismuggling agent with U.S. Immigration

16 and then I was a senior special agent with the

17 Joint Terrorism Task Force in Newark, New Jersey.

18 Q. During what period of time were you

19 assigned to Newark Airport?

20 A. I would work at Newark Airport on an

21 infrequent basis and on a regular basis between the

22 years of 1987 and 2002.

23 Q. What time frame did you spend working

24 with the Joint Terrorism Task Force?

25 A. I started working with the Joint

1 Terrorism Task Force in 1987 on an irregular basis

2 and I -- in 1995, I was assigned on a full-time

3 basis until I retired in 2002.

4 Q. What is the Joint Terrorism Task Force?

5 A. The Joint Terrorism Task Force is a

6 group of agents from various federal law

7 enforcement agencies as well as in New Jersey from

8 the Port Authority police, the Hudson County

9 prosecutor's office, the New Jersey state police.

10 The federal agencies would include the Secret

11 Service, the CIA, U.S. Customs, U.S. Immigration,

12 and I'm sure there's some others I've forgotten.

13 Q. Did you have the opportunity while

14 working with the Joint Terrorism Task Force or

15 while working in immigration at Newark to interview

16 suspects over a -- over that period of time during

17 your career?

18 A. Sure.

19 Q. How many an estimate would you say that

20 you perhaps interviewed?

21 A. Literally hundreds.

22 Q. During the time that you were stationed

23 both frequently and infrequently during various

24 times between 1987 and the year 2002, did you have
25 an opportunity to review security at Newark

5

1 Airport?

2 A. Yes.

3 Q. How would you describe the security
4 between 1987 and before the September 11th attacks?

5 A. Very bad.

6 Q. Can you give me any sort of specific
7 examples of sort of what you witnessed and why you
8 came to the conclusion that it was bad?

9 A. Majority of the personnel I would -- I
10 witnessed and sometimes would be on a daily basis,
11 sometimes an hourly basis because there was many,
12 many days I would spend the entire day at Newark
13 Airport going from terminal to terminal. The
14 majority, and by the majority I mean a high
15 percentage of majority, probably 90 percent plus,
16 appeared to me to be illiterate, not very well
17 educated, some of them had a difficult time

18 understanding English, they were not observant,
19 they did not do a good job, and this was on a daily
20 basis for a long time. I observed this and it was
21 actually a joke amongst other law enforcement
22 personnel when we would talk about these people.
23 We would literally laugh at what they were doing.

24 Q. Laugh because?

25 A. They were not doing a good job. It was

6

1 scary.

2 Q. Did you feel as though during that
3 period of time that there was a threat of some sort
4 of incident with respect to Newark Airport?

5 A. I felt that if someone wanted to carry
6 out an illegal act, they would not have a difficult
7 time doing it at all. All's one would have to do
8 would be observe these people for a couple hours
9 and they'd figure out a way to accomplish whatever
10 they wanted to do.

11 Q. Have you had the opportunity on the

12 general news to have seen the Dulles screening

13 video that was played by ABC and CBS?

14 A. Yes.

15 Q. And how would you compare the security

16 that was conducted on that video to what was

17 happening at Newark Airport from 1987 to before

18 2001?

19 A. Similar or worse.

20 Q. Meaning that the security at Newark was

21 worse than what was depicted on the security at

22 Dulles?

23 A. By a lot of the people that worked

24 there, sure.

25 Q. Did there ever come a time during your

7

1 work in Newark that there were any investigations

2 that were done of any of the individuals working

3 for security screening companies or other companies

4 at the airport?

5 A. Yes.

6 Q. Can you describe for us what that
7 investigation was?

8 A. It was an investigation that -- it was
9 prior to 9/11. I would say this investigation took
10 place in -- sometime after 1995 and prior to 1999,
11 an agent -- an immigration agent carried out this
12 investigation and it was something everybody knew
13 and he finally brought it to a head and he
14 determined there was well over a hundred, maybe 200
15 illegal aliens working at the airport that had
16 access to all areas of the airport, secured,
17 nonsecured, they all had -- a majority of them had
18 badges to swipe to get in through the doors of
19 various segments of the airport. These would be
20 cleaning personnel, all types -- just any type of
21 personnel you could dream of that worked at the
22 airport.

23 So along with the Port Authority
24 police, probably the entire staff of the
25 immigration office, special agents conducted a raid

1 at the airport at shift change in order to get both
2 shifts and they arrested -- they filled up two
3 buses. I would say well over a hundred, definitely
4 over a hundred, possibly over 150 people were
5 arrested at that time at Newark Airport and all
6 these people were illegal aliens working at the
7 airport. It was a disgrace.

8 Q. Did any of the people -- were any of
9 the people arrested employees for any of the
10 security screening companies that were doing
11 security at the airport?

12 A. Possibly. I couldn't say for sure.
13 There was just so many people arrested. And at the
14 time I wasn't concentrating on that aspect of it
15 so -- it's very possible but I don't know for sure.
16 The important thing is that these people had the
17 cards, the swipe cards, and these were the people
18 that were cleaning the aircraft, a majority of
19 them. These people had total access to the
20 aircraft when there was nobody around. It's --

21 just thinking about it scares me today. I mean, it

22 just wasn't right.

23 And then there would be -- after this

24 operation took place and the word got around that

25 this agent was interested in anyone else that the

9

1 various companies and Port Authority and the

2 airlines would hire, they would call him up and

3 make him aware of these illegal aliens working at

4 the airport but he was not permitted to follow up.

5 Q. So even after these arrests, the

6 problem of hiring illegal aliens either by the

7 airlines, security screening companies --

8 A. Yes.

9 Q. -- continued?

10 A. Yes.

11 Q. Did not improve?

12 A. No, it did not improve.

13 Q. Was it a well-known event at the -- at

14 Newark Airport at that time that all these people

15 had been arrested?

16 A. Oh, yeah, because people when they came
17 into work early the next morning, nothing was
18 accomplished because all of their staff were
19 arrested.

20 Q. During your time with the Joint
21 Terrorism Task Force, you said you sort of worked
22 with them on an interim basis starting in 1987?

23 A. Correct.

24 Q. Did you ever have an opportunity to
25 investigate anything related to the World Trade

10

1 Center bombing in '93 or any other terrorist
2 incidents related to Islamic fundamentalist
3 activity?

4 A. Yes, I was involved in the first World
5 Trade Center attack with the -- along with the
6 Blind Sheikh, with the -- any segment of the
7 operations that took place in New Jersey, I was
8 involved in -- I would say on the periphery. I

9 wasn't really a case agent like I would become
10 after 1995 but I would assist in the processing of
11 aliens and doing background checks on various
12 people that were under investigation, et cetera, et
13 cetera.

14 Q. Who was the main perpetrator of the
15 World Trade Center attack in 1993?

16 A. Well, there was a lot of people
17 involved but I would say Ramzi Yousef.

18 Q. Did Ramzi Yousef have plans to conduct
19 any other terrorist attacks?

20 A. Well, after the initial World Trade
21 Center, I believe -- no, I don't believe, I know,
22 he was the individual that fermented, created,
23 dreamt up the Bojinka plot to hijack 12 airplanes
24 simultaneously.

25 Q. Did the Bojinka plot, was that an event

11

1 that you learned through some sort of classified
2 information or was this an event that you became

3 familiar with from public source information?

4 A. Newark was not involved in that

5 investigation in any way, shape or form. No, I

6 would not have learned of it through any -- through

7 any of my work. I learned about it just reading

8 the newspaper, Time, Newsweek, et cetera, et

9 cetera. It was just all over the press.

10 Q. Was -- did that change your thinking

11 with respect to the threat or did it reinforce what

12 you already knew about the threat posed to aviation

13 from Islamic fundamentalist groups?

14 A. All's it did was serve to reinforce.

15 It was something we always knew was possible.

16 Q. Did there ever come a time where you --

17 let me ask one other question before I get to that.

18 Were there general statements given by

19 Islamic fundamentalists that they had the intent to

20 attack the United States?

21 A. Prior to 9/11, yes. There were

22 statements, there were threats, there was -- yeah.

23 There was a fatwah or a statement given by the

24 Blind Sheikh that was arrested in Jersey City out

25 of a prison where I believe it was smuggled out by

12

1 his attorney, a female attorney. I forget her
2 name. It might have been Lynn Stewart, I'm not
3 sure. But he talked about hijacking planes,
4 killing as many people as possible. And this was
5 well before 9/11 and I believe this woman is being
6 prosecuted for that as we speak.

7 Q. Was there any connection between the
8 Blind Sheik and Ramzi Yousef or Osama Bin Laden or
9 al-Qaeda, is he in any way --

10 A. They're all connected. They're all
11 interconnected.

12 Q. Did there ever come a time where you
13 began investigation concerning anyone who posed an
14 immediate -- or who claimed to be planning to
15 hijack aircraft in the United States?

16 A. Yes.

17 Q. Who was that?

18 A. Niaz Khan.

19 Q. How did you come to meet Niaz Khan?

20 A. Niaz Khan turned himself in to the

21 Atlantic City police department in I believe

22 sometime around April of 2000. He advised the

23 Atlantic City police that he was sent to the United

24 States to hijack an aircraft. As soon as the

25 Atlantic City police heard that, they notified the

13

1 local office of the FBI in Atlantic City. Since

2 that office did not handle terrorism, they called

3 up the Terrorism Task Force in Newark, New Jersey.

4 Two agents responded, picked up Niaz Khan and

5 brought him up to Newark and that's when I first

6 met him.

7 Q. This was the spring of 2000, is that --

8 A. April, I believe.

9 Q. April of 2000.

10 A. 2000.

11 Q. And did you have an opportunity to meet

12 with Niaz Khan and to ask him questions?

13 A. I dealt with him on a daily basis until

14 I actually escorted him back to England.

15 Q. How -- what time period did Niaz Khan

16 spend with you or with the Joint Terrorism Task

17 Force in Newark?

18 A. The exact dates I can't recall but it

19 was from approximately the first week of April

20 until about Easter of 2000. I remember I returned

21 to the U.S. after Easter Sunday of 2000 so it was

22 from the first week of April until Easter of 2000.

23 Q. So roughly two, three, four weeks?

24 A. Exactly.

25 Q. What did Niaz Khan tell you about his

14

1 intent to hijack an aircraft?

2 A. He told us the whole story. We

3 spent -- literally spent -- 24 hours a day, seven

4 days a week there was someone with him at all

5 times. He was never incarcerated. He was either

6 kept in a motel room or in a safe house and always

7 with an agent. Basically, he was a gambler. He
8 was addicted to gambling. One night prior to when
9 we encountered him in April, so I would have to say
10 it was sometime in March of 2000, I'm just
11 guessing, he left a casino in Manchester, England,
12 having lost all of his money and there was two
13 individuals outside the casino in a vehicle. They
14 approached him.

15 They talked to him for a long period of
16 time and they basically -- they recruited him to
17 hijack an airplane. I guess he was
18 psychologically -- I can't think of the word at the
19 time but he was weak at that point in his life. He
20 was I guess financially destitute. They offered
21 him some dough and he took them up on their offer.
22 He didn't go home and he flew to Lahore, Pakistan.

23 Q. When he arrived in Lahore, what did
24 he -- what happened after he arrived in Lahore?

25 A. He arrived in Lahore, he was told to go

1 to a specific hotel or guest house, I forget, I
2 think it was a hotel, and he was met there the next
3 day by an individual. I don't recall the specifics
4 about that individual. And he was blind folded,
5 driven outside of Lahore to a guest house
6 surrounded by a high wall and there he went through
7 a week to ten days of training to prepare him for
8 hijacking an aircraft.

9 Q. Did you learn what he was taught
10 specifically about how to hijack an aircraft?

11 A. I can't recall everything he said. It
12 was a lot, probably a lot more than I can remember
13 what he said because I don't have the file in front
14 of me. But he was given small arms training. They
15 had a target in the courtyard of the build -- of
16 the house that was surrounded by this wall where he
17 took target practice. He viewed photos and
18 videotapes of aircraft, various types of aircraft.
19 He had physical defense type training using his
20 hands.

21 I believe he was taught -- I don't know

22 if he was taught in the use of a knife but I recall
23 him talking about using a knife and when he used
24 the knife he was taught to cut the throat because
25 that would produce the most blood to put fear into

16

1 the other passengers. I remember him talking about
2 that. That's mainly what I can remember. But it
3 was very specific in the hijacking of an aircraft.
4 That was the sole purpose of his trip to Lahore,
5 Pakistan.

6 Q. Was Niaz -- did Niaz Khan ever discuss
7 whether if this operation was to be a martyrdom
8 operation or did he have the mindset at the time
9 that he might have to kill himself in order to
10 carry out this attack?

11 A. I remember this specifically. He said
12 that if the mission required it, he would be -- he
13 would -- you know, he would -- he wouldn't mind --
14 he didn't mind dying. But he was led to believe
15 that it was not going to be a suicide mission, that

16 it was going to be a hijacking, but if the
17 hijacking went bad, then they would blow the plane
18 up or crash or do something like that but he was
19 willing to die.

20 Q. He was willing to die. Did -- after
21 Niaz received this training, what did they -- what
22 did he do next?

23 A. He was then given tickets and he flew a
24 circuitous route prior to landing at JFK in New
25 York. I know he went to London, but from London he

17

1 went to Zurich and I believe one other European
2 city, then back to London and to JFK Airport.

3 Q. And when he arrived in JFK Airport,
4 what was he -- what did he do next?

5 A. He was told to rendezvous with an
6 individual by the name of Babu Khan at a taxi
7 stand, that's B-A-B-U K-H-A-N, Babu Khan, at a taxi
8 stand. He got cold feet, he chickened out. I
9 guess somehow he learned about Atlantic City.

10 Maybe he read something on the airplane on the way

11 over, I don't know. But he took a bus to Atlantic

12 City and he blew all the cash they gave him for

13 expenses on the gambling tables at one of the

14 casinos in Atlantic City.

15 Q. So he had gambled away the money that

16 he was given by --

17 A. Oh, yeah. We have the -- we recovered

18 the videotapes of him gambling and losing his money

19 in Atlantic City. We saw it on the videotapes.

20 Those videotapes the FBI have and, yes, no

21 question.

22 Q. After he lost his money that had been

23 given to him by members of al-Qaeda, did he -- what

24 did he do next?

25 A. Turned himself over to the Atlantic

18

1 City police department.

2 Q. And then is that how you met him?

3 A. Yes.

4 Q. During your two, three-week period with

5 Niaz Khan, did you make an assessment as to whether

6 or not he was truthful or not truthful?

7 A. Initially we didn't believe him. We

8 just thought, hey, this guy is -- you know, this

9 guy is just a whack job, there's just no way we

10 believed him. But the more we talked to him, the

11 more we spent time with him, we started to believe

12 him. And then he was polygraphed and he was

13 polygraphed by probably the best polygrapher the

14 FBI has and he works in Newark. And he passed,

15 showed absolutely no deception, and he kept the

16 story throughout the entire time we were with him

17 so everyone in Newark that had anything to do with

18 Niaz Khan believed he was telling the truth.

19 Q. During your -- let me show you

20 something here. Do you recognize what these are?

21 A. Yes.

22 Q. I'd like to mark that as the first

23 exhibit. What are these?

24 A. These are -- Niaz sat down with a New

25 Jersey state police sketch artist and these are the

1 individuals -- the two individuals that recruited

2 him at the casino and one of his trainers in

3 Lahore, Pakistan, outside of Lahore, Pakistan.

4 Q. Could you show these to the camera?

5 A. Sure.

6 MR. ELSNER: Can you get a zoom-in shot

7 of those?

8 VIDEO TECHNICIAN: Sure.

9 THE WITNESS: This -- these are --

10 that's the same. These would be, I believe --

11 these would be the two individuals that recruited

12 him at the casino in England and this is one of his

13 teachers at the location he was trained at outside

14 of Lahore, Pakistan.

15 MR. ELSNER: Why don't we mark these

16 instead as exhibit 1, 2 and 3.

17 (PLF. EXH. 1, sketch, was marked

18 for identification.)

19 (PLF. EXH. 2, sketch, was marked

20 for identification.)

21 (PLF. EXH. 3, sketch, was marked

22 for identification.)

23 BY MR. ELSNER:

24 Q. After performing these sketches, after

25 conducting a polygraph examination, did the FBI

20

1 create any documents that they distributed that

2 describes the threat that Niaz Khan posed to

3 aviation?

4 A. Sure. There were constant

5 communications, both oral and written, between the

6 Newark division and FBI headquarters in Washington,

7 DC and there were teletype -- there was a teletype

8 prepared that was sent out to various government --

9 U.S. Government agencies.

10 Q. Let me show you this. Do you

11 recognize -- I'm going to mark this as exhibit 4.

12 Do you recognize this document?

13 A. Yes, this is an unclassified teletype

14 prepared by my partner, who I worked with during
15 this investigation.

16 (PLF. EXH. 4, teletype, was marked
17 for identification.)

18 BY MR. ELSNER:

19 Q. What is the subject of the -- of the
20 teletype and what is the teletype's date?

21 A. The date of this teletype is April
22 10th, 2000 and this talks about Niaz Khan and the
23 al-Qaeda plot to hijack an aircraft in the United
24 States.

25 Q. Is there -- have you had an opportunity

21

1 to review this teletype and is it accurate?

2 A. I read it this morning prior to this
3 interview and, yes, it's extremely accurate. This
4 is exactly what I recall happening.

5 Q. The distribution of this teletype, did
6 it include anyone within the -- you know, had some
7 involvement with aviation security?

8 A. Yes. It says right here, FAA national
9 headquarters in Washington, DC, immediate. An
10 immediate teletype means that they are to take
11 action on it immediately. There are different
12 classifications of teletypes and this one is an
13 immediate.

14 Q. The teletype states that there was a
15 subject affiliated with Osama Bin Laden who may
16 highjack a U.S.-based airliner from the New York
17 metropolitan area. Is that an accurate statement?

18 A. Yes.

19 Q. The -- have you -- after -- after you
20 had -- after these teletypes were written after
21 Niaz Khan had done his polygraph examination, what
22 happened with Niaz-Khan next?

23 A. Myself and the author of this teletype
24 escorted him back to Heathrow Airport in United
25 Kingdom at the direction of FBI headquarters.

1 Q. What was the reason that he was sent

2 back to the United Kingdom instead of kept in the
3 United States?

4 A. Well, I can only give you an answer
5 based upon my experience. I don't know the exact
6 reason because it's not -- I never saw -- I wasn't
7 involved in the telecommunications regarding his
8 removal to the United Kingdom nor was I privy to
9 any written communications regarding as to why he
10 was brought back, I can only surmise. I can only
11 give you an educated guess. Well, one is not a
12 guess. The U.S. Attorney in Newark refused to
13 prosecute Niaz Khan. The exact reasons, I don't
14 recall. Maybe we didn't have enough evidence.

15 Number two, the conspiracy was hatched
16 in England. He was recruited in England by these
17 two individuals who you just saw the photos, the
18 sketches of, and the FBI rightly so reasoned that,
19 hey, let's send him back to England and let them
20 start the investigation right from the beginning to
21 find -- to apprehend these two individuals, do a
22 complete background investigation on them, find out

23 who they are, who they're associated with and do a
24 total investigation. The FBI in America wouldn't
25 be capable of doing that. That would have to be

23

1 done by the English authorities. And since Niaz
2 Khan was a citizen of the United Kingdom and that's
3 where his family was and that's where he resided,
4 they figured that -- I guess they figured that was
5 the best thing to do.

6 Q. Do you know whether the authorities in
7 the United Kingdom did any follow-up effort
8 concerning Niaz Khan?

9 A. In the last couple months I learned
10 exactly what happened, I learned exactly what
11 happened, and it's an absolute disgrace. There was
12 absolutely no follow-up by the British authorities,
13 none.

14 Q. Have you -- Niaz Khan has given a
15 statement to plaintiffs in this case. And have you
16 had the opportunity to -- I'm going to mark this as

17 the next exhibit, exhibit 5.

18 (PLF. EXH. 5, statement, was marked

19 for identification.)

20 BY MR. ELSNER:

21 Q. Have you had the opportunity to review

22 his deposition or statement? It's not really a

23 deposition, his statement or interview given to

24 plaintiffs in this case?

25 A. Yes, I have.

24

1 Q. Do you -- is -- are the statements made

2 by Niaz Khan consistent with the statements that he

3 made to the FBI in 2000 before September 11th?

4 A. Absolutely.

5 Q. Do you find that the statements that

6 he's making in this particular statement for

7 plaintiffs to be accurate and consistent with his

8 story as he's told it since early 2000?

9 A. Yes.

10 MR. ELSNER: Go off the record for a

11 second.

12 VIDEO TECHNICIAN: I'm off the record.

13 (Off-the-record conference.)

14 VIDEO TECHNICIAN: And we're back on

15 the record.

16 BY MR. ELSNER:

17 Q. After the attacks on September 11th,

18 2001, did you -- were you involved in any

19 investigations concerning the September 11th

20 attacks?

21 A. Yes.

22 Q. How were you involved?

23 A. I was totally immersed in the

24 investigation of Flight 93, the hijacking of the

25 aircraft from Newark Airport. I was a team leader.

25

1 Q. After the September 11th investigation

2 or during the September 11th investigation, were

3 you involved in any other investigations of attacks

4 against U.S. citizens?

5 A. Yes.

6 Q. Who is that? Who was that?

7 A. Danny Pearl.

8 Q. And can you tell us about that

9 investigation generally? What time frame was it?

10 A. That was in -- started in January of

11 2002. A group of agents were sent to Karachi,

12 Pakistan to investigate Danny Pearl's kidnapping.

13 Q. And during that investigation, did you

14 learn anything about any of the perpetrators

15 involved in the kidnapping and assassination?

16 A. Sure. We identified one, two, three or

17 four of the kidnappers as well as the leader, Omar

18 Sheikh.

19 Q. Who is Omar Sheikh?

20 A. Omar Sheikh is a radical fundamentalist

21 who was educated at the London School of Economics

22 in London. I've never met him but I know he speaks

23 fluent English, he has an extremely Muslim

24 fundamentalist terrorist -- slash terrorist

25 background. He was incarcerated in India for his

1 terrorist acts in that country and, as a matter of
2 fact, was released from prison because of an
3 aircraft that was hijacked out of I believe Nepal
4 in 1999.

5 Q. The aircraft that was hijacked, do
6 you know where that aircraft landed and what
7 happened after --

8 A. Well, it landed in a couple of places
9 but it ended up in Afghanistan, I believe Kandahar.

10 Q. And Afghanistan at that period of time
11 was -- who is -- where was -- under whose control
12 was --

13 A. Taliban.

14 Q. And after the plane landed, what took
15 place next with respect to the hijacking?

16 A. Well, I believe there was a trade. The
17 passengers were released and I believe two or three
18 individuals were released from custody in India,
19 one of whom was Omar Sheikh.

20 Q. And after Omar Sheikh's release, did he

21 have any affiliation with al-Qaeda or with --

22 A. Yes. Oh, yeah, he was involved in
23 al-Qaeda all the way. He was train -- he was
24 involved in -- he -- I know he definitely was a
25 trainer for Osama Bin Laden in the al-Qaeda

27

1 training camps.

2 Q. So this is another incident in which
3 al-Qaeda members were involved with a threat to
4 aviation?

5 A. Yes. Sure.

6 Q. Based on this India hijacking, the plot
7 that you had described earlier, the plot --

8 A. Bojinka plot.

9 Q. -- in 1994 and the statement given to
10 you by Niaz Khan, how would you characterize the
11 threat to civil aviation in the United States from
12 Islamic fundamentalists?

13 A. I'd say it was very likely, very likely
14 to happen based upon everything I learned -- with

15 the accumulation of everything I learned throughout
16 my years and then especially after 9/11, it was --
17 it was all there for everybody to see but nobody
18 saw it.

19 Q. Was the -- was the information about
20 plan Bojinka, the Air India hijacking, Yousef's
21 plot against the U.S., the Blind Sheikh's fatwah,
22 generally public information that anyone
23 investigating aviation security would be aware of?

24 A. Well, sure, most of this I learned
25 through public information. I wasn't involved in

28

1 all of these investigations.

2 Q. Did you -- from 1987 until the '93
3 Trade Center bombing, the '94 plan Bojinka, the '99
4 Air India incident, throughout that period did you
5 recognize increased hike in security or training
6 given to security screeners at Newark International
7 Airport?

8 A. Definitely not.

9 Q. How would you characterize Newark's
10 security system in light of these threats to civil
11 aviation?

12 A. Really bad.

13 MR. ELSNER: I have no other questions.

14 VIDEO TECHNICIAN: And I've stopped.

15 (A recess transpired.)

16 VIDEO TECHNICIAN: And we're back on.

17 BY MR. ELSNER:

18 Q. Sorry, there was one question I wanted
19 to ask you. Could you review this document for me?
20 Have you seen this document?

21 A. Well, I've seen similar documentation.
22 I've never seen this one.

23 Q. How would -- what would -- what type of
24 document is this?

25 A. Appears to be an FBI 302.

1 Q. Are you familiar with generally how FBI
2 302's are written?

3 A. Sure, I've written hundreds, maybe a
4 thousand or more of them.

5 Q. Does this appear to be an accurate 302
6 based on your experience and expertise?

7 A. Yes, it does.

8 MR. ELSNER: Okay, no further
9 questions. Thank you.

10 VIDEO TECHNICIAN: We're stopped.

11 (WHEREUPON, the proceedings concluded
12 at 11:56 AM.)

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1 CERTIFICATE OF REPORTER

2

3 I, Terri L. Brusseau, Registered

4 Professional Reporter and Notary Public for the

5 State of South Carolina at Large, do hereby certify

6 that the foregoing transcript is a true, accurate,

7 and complete record.

8 I further certify that I am neither related

9 to nor counsel for any party to the cause pending

10 or interested in the events thereof.

11 Witness my hand, I have hereunto affixed my

12 official seal this 27th day of October, 2004 at

13 Charleston, Charleston County, South Carolina.

14

15

16

17

Terri L. Brusseau,

18 Registered Professional
Reporter, CP, CRR
19 My Commission expires
May 7, 2006.

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31

1 I N D E X

2 Page

WITNESS/EXAMINATION

3 EXAMINATION 3

BY MR. ELSNER

4 CERTIFICATE OF REPORTER 30

5

REQUESTED INFORMATION INDEX

6

(No Information Requested)

7

8

E X H I B I T S

9

(No Exhibits Proffered)

10

PLF. EXH. 1, sketch 19

11 PLF. EXH. 2, sketch 19

PLF. EXH. 3, sketch 19

12 PLF. EXH. 4, teletype 20

PLF. EXH. 5, statement 23

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Attachment G

بسم الله الرحمن الرحيم
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(Parenthetical remarks in Italic are the translator's)

(Document name: TAREEKHOSAMA/41/Tareekh Osama.108)

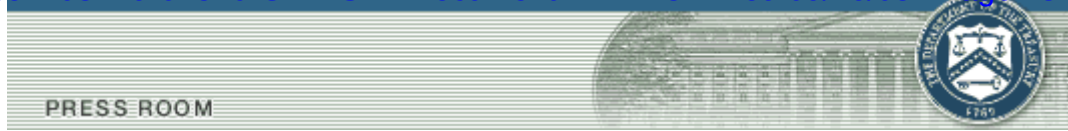
In the name of God, the most gracious, the most merciful

And spend for God's cause (*Quraanic verse*)

- 1) Suleiman Al-Rashid. (Wail)
- 2) Abdel Qader Bakri. (Wail)
- 3) Bin Laden Brothers. (Usama)
- 4) Yousif Jameel. (Baterji)
- 5) Ibrahim Afandi. (Baterji)
- 6) Saleh Kamel. (Baterji)
- 7) Al-Rajhi. (Usama)
- 8) Al-Jumaih. Jeddah (S.A) (Baterji)
- 9) Al-Sharbatly (Usama)
- 10) (*Illegible*) Al-Naghi (Usama)
- 11) Bin Mahfoodh (Usama)
- 12) Abdel Qader Faqeeh (Usama)
- 13) Salah Al-Din Abdel Jawad (Wail)
- 14) Ahmad Turki Yamani (Baterji)
- 15) Abdel Hadi Taher (Wail)
- 16) Mohammed Omar (*illegible*) (Baterji)
- 17) Al- Kuwait (Usama)
- 18) Ahmad Al-Harbi (Salem Taher)

- 19) Al-Issaei (Salem Taher)
- 20) Hamad Al-Husaini (Abu Mazin)

Attachment H

**FROM THE OFFICE OF PUBLIC AFFAIRS**

September 6, 2002
PO-3397

Treasury Department Statement on the Designation of Wa'el Hamza Julidan

Today the United States and Saudi Arabia jointly designated Wa'el Hamza Julaidan, an associate of Usama bin Laden and a supporter of al-Qa'ida terror. We are pleased to be taking our second joint action with the Kingdom of Saudi Arabia to publicly identify and freeze the assets of terrorists and their supporters. The Kingdom of Saudi Arabia has already forwarded his name to the United Nations Sanctions Committee established by UNSCR 1267. Today's designation follows a series of joint actions with our allies in the war on terrorist financing, which to date has included actions with the EU, the G-7 countries, Italy, and now our second joint action with Saudi Arabia.

Today's action brings the total number of names to 236 under President Bush's Executive Order aimed at freezing the assets of terrorists and their supporters – Executive Order 13224. Together with our allies we have blocked over \$112 million in terrorist related assets around the world. "Today's action is important in that it demonstrates the commitment of both the United States and Saudi Arabia to go after high impact targets in our war against terrorist financing," said Treasury Under Secretary for Enforcement Jimmy Gurulé. "We have received unprecedented cooperation from our friends abroad, and today's action is indicative of that synergy and commitment to this issue."

Usama bin Laden and a top al-Qa'ida lieutenant, Abu Zubaida, have acknowledged Wa'el Julaidan as a known associate of their operations. Julaidan has been the head of various non-governmental organizations providing financial and logistical support to the al-Qa'ida network.

Statement of the Case for**Wa'el Hamza JULAIDAN**Identifier Information

Wa'el Hamza JULAIDAN a.k.a. Wa'il Hamza JULAIDAN a.k.a.

Wa'el Hamza JULAYDAN a.k.a. Wa'il Hamza JULAYDAN a.k.a.

Wa'el Hamza JALAIDAN a.k.a. Wa'il Hamza JALAIDAN a.k.a.

Wa'el Hamza JALADIN a.k.a. Wa'il Hamza JALADIN a.k.a. Abu

Al-Hasan al Madani

DOB: January 22, 1958

POB: Al-Madinah, Saudi Arabia

Background Information

Wa'el Hamza Julaidan, a Saudi citizen, is an associate of Usama bin Ladin. Julaidan fought with bin Laden in Afghanistan in the 1980s. Julaidan is also associated with several individuals and entities linked to al-Qa'ida, including bin Ladin lieutenants, Ayman al-Zawahri, Abu Zubaida, and Mohammed Atef; and the

organizations: Makhtab al Khedmat, the Rabita Trust, and al-Gam'a al-Islamiya. These individuals and entities have been previously designated under President Bush's Executive Order and by the United Nations.

Bin Laden himself acknowledged his close ties to Julaidan during a 1999 interview with al-Jazeera TV. When referring to the assassination of al-Qa'ida co-founder Abdullah Azzam, bin Ladin stated that "We were all in one boat, as is known to you, including our brother, Wa'el Julaidan." Julaidan has established contacts with several known Arab Islamic extremists, including bin Ladin's principal lieutenant, Ayman al-Zawahri. Another bin Ladin lieutenant, Abu Zubaida, claimed that he accompanied Julaidan from Pakistan to Kandahar, Afghanistan during the summer of 2000. Zubaida said that Julaidan met with bin Ladin and senior bin Ladin lieutenant Mohammed Atef soon after arriving in Kandahar.

In February 2000, Julaidan was appointed to the Board of Trustees of the Rabita Trust and served as its Director General. The Rabita Trust is an NGO designated under President Bush's Executive Order as an organization that provided logistical and financial support to al-Qa'ida.

Basis for Designation

The United States has credible information that Wa'el Hamza Julaidan is an associate of Usama bin Laden and several of bin Laden's top lieutenants. Julaidan has directed organizations that have provided financial and logistical support to al-Qa'ida. Accordingly, the United States is designating Julaidan under Executive Order 13224 as a person who supports terror.